

The Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ELIZABETH R. PADDOCK,

Plaintiff,

v.

PEACEHEALTH, INC. d/b/a/ ST. JOSEPH'S
MEDICAL CENTER and PEACEHEALTH
MEDICAL GROUP, BELLINGHAM
ANESTHESIA ASSOCIATES, P.S., FOURTH
CORNER NEUROSURGICAL ASSOCIATES,
INC., P.S., NORTHWEST RADIOLOGISTS,
INC., P.S., DAVID E. BAKER, M.D., JASON
M. STOANE, M.D., PAUL B. FREDETTE,
M.D., JOHN E. MORRISON, M.D., and TUNG
M. HA, D.O.,

Defendants.

Case No. 2:21-cv-00639-RSL

STIPULATION AND ORDER OF
DISMISSAL WITH PREJUDICE OF
DEFENDANTS NORTHWEST
RADIOLOGISTS, INC., P.S. AND JASON
M. STOANE, M.D.

STIPULATION

All parties, by and through their respective counsel of record, hereby stipulate and agree that any and all claims of causes of action that were or could have been brought by Plaintiff against Defendants Northwest Radiologists, Inc., P.S. and Jason M. Stoane, M.D. herein, are dismissed with prejudice and without costs and fees to any party.

Defendants PeaceHealth, Inc. d/b/a St. Joseph's Medical Center, PeaceHealth Medical Group, Bellingham Anesthesia Associates, P.S., Fourth Corner Neurosurgical Associates, Inc.,

STIPULATION AND ORDER OF DISMISSAL
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NORTHWEST RADIOLOGISTS, INC., P.S. AND
JASON M. STOANE, M.D. – 1
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David E. Baker, M.D., Paul B. Fredette, M.D., John E. Morrison, M.D., and Tung M. Ha, D.O. further stipulate and agree that they will not allege that Northwest Radiologists, Inc., P.S. and Jason M. Stoane, M.D. are at fault in this matter or that the care they provided Plaintiff was below the standard of care, or that their actions and/or failures to act caused any injury or harm to plaintiff. Defendants PeaceHealth, Inc. d/b/a St. Joseph's Medical Center, PeaceHealth Medical Group, Bellingham Anesthesia Associates, P.S., Fourth Corner Neurosurgical Associates, Inc., David E. Baker, M.D., Paul B. Fredette, M.D., John E. Morrison, M.D., and Tung M. Ha, D.O. further stipulate and agree that they will not seek to allocate fault against Northwest Radiologists, Inc., P.S. and Jason M. Stoane, M.D. pursuant to RCW 4.22.070.

DATED this ____ day of January, 2023.

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ORDER

Having come before the Court upon the Parties' Stipulation and Order of Dismissal with Prejudice, and having fully considered the same and found good cause exists therefor:

It is HEREBY ORDERED, ADJUDGED, and DECREED that any and all claims and causes of action which were or could have been brought by Plaintiff against Defendants Northwest Radiologists, Inc., P.S. and Jason M. Stoane, M.D. are hereby dismissed with prejudice and without costs and fees to any party.

DATED this 9th day of January, 2023.



HON. JOHN H. CHUN
United States District Judge

Presented by:

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Approved as to form, notice of presentation waived:

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of January, 2023, I served the foregoing

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